

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC and the estate of Bernard L.
Madoff,

Plaintiff,

v.

CITIBANK N.A., CITICORP NORTH
AMERICA, INC. and CITIGROUP GLOBAL
MARKETS LIMITED,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05345 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND
AND ADJOURNING PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Trustee may respond to the Motion to Dismiss filed by Defendants Citibank, N.A., Citibank North America, Inc. and Citigroup Global Markets Limited (the “Defendants”) is extended up to and including March 9, 2017. It is further stipulated and agreed that the Defendants shall file any reply by June 9, 2017. The return date for this matter was previously set for April 26, 2017 at 10:00 a.m., but will be rescheduled for July 26, 2017 at 10:00 a.m. The pre-trial conference will be adjourned from May 31, 2017 at 10:00 a.m. to August 30, 2017 at 10:00 a.m.

The purpose of this stipulation extension (the “Stipulation”) is to provide additional time for the Trustee to respond to the Defendants’ Motion to Dismiss. This is the twenty-fifth such extension. Nothing in this Stipulation is a waiver of the Trustee’s right to request from the Court a further extension of time to respond to the Defendants’ Motion to Dismiss and/or the Defendants’ right to object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), ECF No. 12312).

[Remainder of page intentionally left blank.]

Dated: December 6, 2016
New York, New York

/s/ David J. Sheehan
David J. Sheehan
Regina L. Griffin
Melissa L. Kosack
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the SIPA
Liquidation of Bernard L. Madoff Investment Securities
LLC and Bernard L. Madoff*

/s/ Carmine D. Boccuzzi, Jr.
Carmine D. Boccuzzi, Jr.
CLEARY GOTTlieb STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 2250-3999

*Attorneys for Defendants Citibank, N.A., Citibank North
America, Inc. and Citigroup Global Markets, Limited*

SO ORDERED: December 6, 2016

/s/ STUART M. BERNSTEIN
Hon. Stuart M. Bernstein
United States Bankruptcy Judge